

July 15, 2004

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: MM Docket No. 99-325

Dear Ms. Dortch:

On behalf of Pillar of Fire, licensee of KPOF, Denver Colorado, I am writing in response to the Federal Communications Commission's Further Notice of Proposed Rulemaking in this proceeding and the recent Public Notice about AM nighttime service. KPOF is a 5kw day, 1kw night non-directional 910 kHz AM station currently broadcasting using iBiquity Digital Corporation's HD Radio™ system. KPOF Radio is pleased to be the first operational HD Radio™ system in Colorado.

KPOF Radio strongly supports the FCC's efforts to develop final rules for digital service. We have been extremely pleased with the ease of implementation of the HD Radio™ system and the quality of the digital signal. Our experience indicates the improved audio quality of the digital AM signal has the potential to transform the listening public's views of AM radio and to significantly enhance AM radio's ability to compete with new formats and service.

KPOF Radio has been operating HD Radio™ during authorized daytime hours without interruption since February 27, 2004. We are extremely pleased with the quality and reliability of the system. The performance of the system is meeting or exceeding our expectation. Our testing and experience since turning the system on in February shows that our digital coverage generally matches our 5.0 mv/m analog contour. There are a few locations within our coverage area in which the digital signal will drop out, but the transition from digital to analog and back is very graceful and no content is lost.

For demonstration and testing, we are using a commercially available consumer receiver in a station promotional vehicle using the original equipment speaker system with no additional equalization or power enhancement. Listeners are able to directly compare any AM or FM station in the area with HD Radio™ on the same receiver. Every listener hearing the HD Radio™ demonstration has been very impressed with the quality and clarity of the broadcast whether music or voice. A typical response has been that it sounds as good or better than analog FM, like listening to a CD.

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A small sample of KPOF (aka AM 91) actual listener comments are transcribed below:

1. "It's amazing the difference, it sounds real muddy kind of one dimensional on the one side and then when you switch over it's just like opening the doors on the speakers, it's just amazing it really is, it's just like FM... better than FM I think."
2. "I just listened to the HD Radio on AM 91 and it is fabulous!"
3. "This new HD Radio sounds really good, it's crisp and clear and it's fantastic, it's great to listen to AM 91 on it."
4. "I just listened to HD Radio on AM 91 and it's spectacular, I gotta find me one of those radios."
5. "I just listened to HD Radio and it's absolutely amazing! Just amazing! You want to go out and buy this kind of radio. Congratulations to everyone at AM 91."
6. "I am so glad to see that AM 91 is on digital radio, the sound quality between it and the old analog is extreme, you can't help but enjoy it so much more, I'm so proud of AM 91 for taking that step and it will just make the listening so much more enjoyable for everybody involved, thank you AM 91."
7. "HD Radio, I'm reminded of FM, how you get that stereo sound, that stereo effect, good pure clear signal."
8. "I just listened to the HD Radio on AM 91 and heard a huge difference, it's sounds great!"
9. "I just had a ride in the PT Cruiser with the HD Radio and the radio sound is so crystal clear, no background noise, it's just very relaxing, it's a wonderful transition from regular AM radio, I just thoroughly enjoyed my little ride in this little PT Cruiser and listening to the HD Radio, it's a beautiful sound."
10. "Well, it's seems to be quit a bit of a more clear message, clearer sounds and the sounds... the music is a lot more clearer with the instruments, we think it's very nice."
11. "I think it sounds really good, it's clear and you can hear the instruments, and it's nice."
12. "I've just had a demonstration of HD Radio with digital AM and I am blown away! When I first heard it sounds better than FM...well, I thought isn't FM the best that you can get? ... and it does, an AM station on digital sounds better than a normal FM station 'cause I've just listened to them side by side. It is amazing to listen to, the sound is very rich, it's very full, it doesn't have any of those tinny, or high, edgy, pitchy kind of sounds to it, it's very rich and full."
13. "It's very nice, it's a total difference from any other station I've listened to."
14. "I'm just sitting here listening to HD Radio in the AM 91 Cruiser, and it's, it's incredible, I listen to a lot of music, and just the clarity, it's at least CD quality, and compared to FM there's just no comparison. It's wonderful!"
15. "Yeh, I just heard HD on AM 91 and I am really blessed with the music and outreach you guys are doing."

Listener response has been extremely positive. The only hesitation or concern expressed among our listeners is the initial cost of the receivers. Encouragement from the FCC in implementation, rule making, twenty-four hour operation, supplemental services and continued improvements is critical to quick adoption of digital radio by broadcasters and listeners alike. The greater the momentum the new HD Radio™ system has, the quicker the costs to the broadcaster, manufacturer and consumer will come down.

KPOF Radio is committed to serving its local community. The Commission has and should show concern for the importance of local service to a community of license. HD Radio™ will give local stations the opportunity to maintain high quality local service. KPOF Radio realizes the need to be aggressive in the service and quality that we provide our listener, so we respectfully ask the Commission to aggressively move forward in the areas of HD radio™ implementation.

We feel very strongly that the FCC should authorize full digital nighttime operation for all AM stations. KPOF Radio recognizes there is a possible greater risk of interference to existing analog signals from nighttime operation of the HD Radio™ system. However, it is KPOF Radio's understanding that any increased interference will occur primarily at the edge of or outside a station's protected coverage area. KPOF Radio believes any impact on listeners in these areas will be offset by the greater benefits HD Radio™ technology will offer the majority of listeners in our primary (local) service area.

It will be difficult for stations to introduce new services or to encourage their listeners to convert to digital if AM broadcasts continue to excluded nighttime service. Our listeners expect continuity and consistency of service. It will be difficult to convince the general public that digital is a beneficial new service, eventually replacing analog, if those benefits disappear every time the sun sets. KPOF Radio encourages the FCC to authorize, immediately and permanently, AM stations to commence digital broadcasts at night. To the extent that there are instances of harmful interference to adjacent stations within 5.0 mv/m contours, the FCC should encourage and permit stations to work together to resolve interference through creative approaches, including reductions in digital power if necessary. In the event that stations are not willing or able to resolve issues in a cooperative fashion, the FCC's existing complaint procedures can adequately address any unresolved matters.

KPOF Radio is not aware of any known or reported interference from its daytime operation of HD Radio since February 27, 2004. We would not anticipate any significant interference with nighttime operation either. The installation included a complete calibration and setup within the guidelines established by iBiquity, by a Nautel transmitter factory engineer using a calibrated spectrum analyzer to confirm compliance

with the NRSC mask limitations. The analog and digital modulation envelope was determined to be in compliance within the NRSC mask.

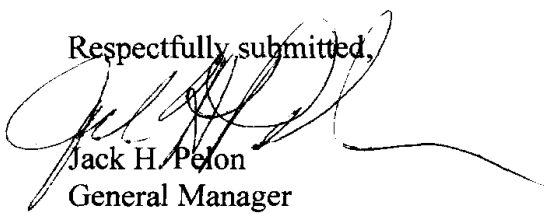
As a matter of interest in rule making, about a month into our HD operation, a local engineer from another station in the area (not an adjacent station), without our knowledge, tested our modulation with his "splatter meter". He informed us after his test, that KPOF Radio was not operating inside the mask. We immediately tested our modulation envelope again with a spectrum analyzer, confirming that the modulation was in fact within the NRSC mask. It is the recommendation of the engineering staff of KPOF Radio, that a "splatter meter" be determined inadequate to properly measure the combined analog and digital envelope within the NRSC mask limitations.

Existing AM services are severely limited by the impairments that affect analog broadcasting. HD Radio™ technology is the first viable solution to many of AM radio's problems and will ensure the continued success of AM. As a result, KPOF Radio is willing to tolerate some increased interference in the short run to derive the full benefits of digital. The sooner digital implementation takes place, the shorter the period of time transition problems will exist.

KPOF Radio also encourages the FCC to avoid undue regulation of the digital service. The FCC's Further Notice proposes many regulations for the digital service. At a minimum, the digital service should not be burdened with greater restrictions or more regulations than are already imposed on existing analog services. Flexibility at this stage in the rollout of the technology will allow broadcasters and equipment manufacturers to extract full advantage of the many benefits offered by HD Radio™ technology. The FCC should structure its rules to encourage innovation absent evidence of interference to other users.

KPOF Radio appreciates the opportunity to offer its views on the Commission's proposals and encourages the Federal Communications Commission to expedite its completion of its In Band On Channel (IBOC) digital rules.

Respectfully submitted,



Jack H. Pelon
General Manager
KPOF Radio
3455 W. 83rd Ave.
Westminster, CO 80031
303-428-0910